

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

DEBORA NOVAKOWSKI,)	
)	
Plaintiff,)	
)	
v.)	CIVIL ACTION NO. 04-356E
)	
ELAINE CHAO, SECRETARY, AND THE)	JUDGE McLAUGHLIN
UNITED STATES DEPARTMENT)	
OF LABOR,)	ELECTRONICALLY FILED
)	
Defendants.)	

DEFENDANTS' MOTION FOR ENLARGEMENT OF TIME TO FILE RESPONSIVE
PLEADING TO PLAINTIFF'S MOTION FOR NEW TRIAL

AND NOW, come Defendants, Elaine Chao, Secretary, and the United States Department of Labor, by their attorneys, Mary Beth Buchanan, United States Attorney for the Western District of Pennsylvania, and Paul E. Skirtich, Assistant United States Attorney for said District and, pursuant to Rule 6(b) of the Fed. R.Civ.P., files the following Motion for an Enlargement of Time of Ten (10) Days, until July 27, 2006, to File Responsive Pleading to Plaintiff's Motion for New Trial:

1. On June 19, 2006, Plaintiff filed a Motion for New Trial. On June 26, 2006, Plaintiff filed her Brief in Support of the Motion for a New Trial.

2. This Court ordered Defendants to respond by July 17, 2006.

3. Counsel for Defendant needs a brief extension of ten (10) days, until July 27, 2006, to complete his response.

4. Plaintiff will not suffer prejudice by this extension.

WHEREFORE, Defendants, Elaine Chao, Secretary, and the United States Department of Labor, respectfully request that the Court issue an Order granting this Motion.

Respectfully submitted,

MARY BETH BUCHANAN
UNITED STATES ATTORNEY

s/Paul E. Skirtich
PAUL E. SKIRTICH
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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the within Defendants' Motion for Enlargement of Time to File Responsive Pleading to Plaintiff's Motion for New Trial was electronically filed and/or served by postage-paid U.S. Mail, to and upon the following:

John R. Linkosky, Esquire
John Linkosky & Associates
715 Washington Avenue
Carnegie, PA 15106

s/Paul E. Skirtich
PAUL E. SKIRTICH
Assistant U.S. Attorney

Dated: July 17, 2006